

Specification and Drawing Amendments

A minor amendment is made to the Specification to correct a typographical error therein.

FIG. 14A is amended to correct a step in the flowchart illustrated therein. This amendment is submitted herewith in accordance with 37 C.F.R. § 1.121(a)(3)(ii).

Rejections under 35 U.S.C. §§ 102, 103

The Office Action rejects:

(a) Claims 20-22, 33, 43, and 44 under 35 U.S.C. § 103(a) as being unpatentable over Takahashi (U.S. Patent 5,067,029) (hereinafter "Takahashi") in view of Sasaki et al. (U.S. patent 5,034,804) (hereinafter "Sasaki");

(b) Claims 40-42 under 35 U.S.C. § 103(a) as being unpatentable over Sasaki in view of Kinoshita et al. (U.S. patent 4,897,732) (hereinafter "Kinoshita");

(c) Claim 45 under 35 U.S.C. § 103(a) as being unpatentable over Takahashi in view of Sasaki and in further view of Kinoshita;

(d) Claim 34 under 35 U.S.C. § 103(a) as being unpatentable over Takahashi in view of Sasaki and in further view of Finelli (U.S. Patent 4,937,676) (hereinafter "Finelli");

(e) Claim 46 under 35 U.S.C. § 103(a) as being unpatentable over Takahashi in view of Sasaki and Kinoshita and in further view of Orii (U.S. Patent 5,200,863) (hereinafter "Orii");

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(f) Claims 31 and 37 under 35 U.S.C. § 103(a) as being unpatentable over Lang (U.S. Patent 4,963,995) (hereinafter "Lang") in view of Sasaki; and

(g) Claim 32 under 35 U.S.C. § 103(a) as being unpatentable over Lang in view of Sasaki and in further view of Watanabe (U.S. Patent 5,032,927) (hereinafter "Watanabe").

Applicants respectfully traverse each of the above rejections for the reasons set forth below.

In regard to Claims 20 and 43, the recited inventions are respectively directed to a camera which provides, generally, the ability to selectively transfer image information from an imaging device to a connected first memory or a connected second memory for storage. Each claimed invention includes a changer that selects a recipient (coupled) memory to facilitate storage of image information based on a detected memory condition.

For these claims, the Office Action states that the claimed inventions were obvious in view of the combined teachings of Takahashi and Sasaki. First, Takahashi is said to teach of a camera apparatus having a plurality of differing memories which are provided in a camera housing. The memory types include optical recording unit (30), semiconductor memory (40), magnetic recording unit (50). A selector (24) enables selection of memories (30), (40), and (50). The selector (24) is user-operated (Takahashi at column 7, lines 41-43) or controlled as a function of the inputted image data (Takahashi at column 7, lines 45

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and 46). *Takahashi is silent with regard to the selector (24) operatively selecting a memory based on a detected memory condition.*

The Office Action provides that Takahashi discloses a "changing means," such changing means being an operation display (22) and a signal line (128). Further citing column 7, lines 40-47 of Takahashi, the Office Action indicates that the Takahashi reference teaches "a control means" that selects a memory based on a detected signal. Office Action at p. 5.

It is submitted, however, that a portion of the excerpts cited by the Office Action concern only (i) displaying information on an operation display (22), wherein the information concerns an earlier user-selected memory choice (see Takahashi at column 4, lines 2-4), or (ii) facilitating a user-instructed memory change (see Takahashi at column 5, lines 53-55). The remaining excerpt (i.e., Takahashi at column 7, lines 40-47) discloses a method of memory selection **based on an attribute (or characteristics) of incoming data** (e.g., speed, etc.). In other words, Takahashi fails to teach of a detector and a changing means, adapted to work in concert, to change between memory destinations for the storage of image data based on a detected memory condition.

The Sasaki reference discloses a camera (10) capable of storing image information on a card memory (15). The Examiner cites Sasaki as teaching a camera using a semiconductor memory. Appropriately, the Office Action does not assert that Sasaki teaches a

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detector and a changing means in accordance with the claimed invention. Sasaki does not include such teachings. Accordingly, the combination of Sasaki and Takahashi fail to disclose or teach each of the limitations of Claims 20 and 43, respectively. It is respectfully submitted that even if the teachings of Sasaki properly modified the teachings of Takahashi, such modified/combined teachings do not render obvious the individual claimed invention of Claim 20 or Claim 43.

The above discussion is equally applied to each of the claims that respectively depend from Claims 20 and 43. However, the specific rejections of Claims 34, 45, and 46 will be further addressed immediately below.

Claim 34 is dependent upon Claim 20. In response to the additional limitations of Claim 34, the Examiner further cites the Finelli reference for combination with the above teachings of Takahashi and Sasaki. In particular, Finelli is said to disclose a printing device.

Even if it is admitted that Finelli teaches a printer, the Finelli reference fails to overcome the deficiencies of the Takahashi and Sasaki combination. Specifically, Finelli does not teach or suggest a detector and a changing means, adapted to work in concert, to change from one memory to another memory based on a detected condition of one of such memories for purposes of identifying a location for data storage. Accordingly, it is respectfully submitted that the combination of Takahashi, Sasaki, and Finelli

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fails to disclose, teach or suggest the claimed invention. Further, Applicants respectfully submit one having ordinary skill in the art could not reasonably combine these references, whether as cited or with any other known reference, to derive the present invention nor render it obvious.

Claim 45 is directly dependent from Claim 43. To address the added limitations of Claim 45, the Office Action combines the earlier-discussed teachings of Takahashi and Sasaki with those of Kinoshita.

The rejection of Claim 45 relies upon the Kinoshita reference to provide teachings of a selecting structure interpositioned between an output device and multiple memory devices. Notwithstanding, the Kinoshita reference fails to overcome the deficiencies of the Takahashi and Sasaki combination. In particular, Kinoshita fails to disclose a detector and a changing means in accordance with the claimed invention. Accordingly, the combination of Sasaki, Takahashi, and Kinoshita fail to disclose or teach each of the limitations of Claim 45. Further yet, it is respectfully submitted that even if the teachings of Sasaki properly modified the teachings of Takahashi and/or Kinoshita, such modified/combined teachings do not render obvious Claim 45.

Claim 46 is indirectly dependent from Claim 43. To address the added limitations of Claim 46, the Office Action combines the earlier-discussed teachings of Takahashi and Sasaki with those of Orii.

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Orii is said to contribute the incorporation of a reproduction device for displaying images within a camera body. Office Action at p.7. However, the teachings of Orii, whether limited to these specific teachings or any other aspect of that disclosure, fails to overcome the noted deficiencies of the Takahashi and Sasaki combination.

It is respectfully submitted that the combination of Takahashi, Sasaki, and Orii fails to disclose, teach or suggest the claimed invention. Applicants further submit one having ordinary skill in the art could not reasonably combine these references, whether as cited or with any other known reference, to derive the present invention nor render it obvious.

In regard to Claim 40, the claimed invention requires, in part,

a detector to detect an available memory capacity and to output a signal representative of a result of such a detection; and

a first changer to selectively change between a first condition, in which image information outputted from said imaging device would be directed to the first connection for storage in a connected first memory, and a second condition, in which image information outputted from said imaging device would be directed to the first connection for storage in a connected second memory, based on an output signal from the detector;

. . .

In reference to the discussion set forth above regarding Sasaki and Kinoshita, the noted deficiencies

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of Sasaki are not cured by the teachings of Kinoshita. To this point, neither Sasaki and Kinoshita teach either a detector or a first changer, adapted to work in concert, to select one memory or another memory based on a detected memory capacity.

Thereby, it is respectfully submitted that the combination of Sasaki and Kinoshita fails to disclose, teach or suggest the claimed invention. Further, Applicants respectfully submit one having ordinary skill in the art could not reasonably combine these references, whether as cited or with any other known reference, to derive the present invention nor render it obvious. This discussion is equally applied to Claims 41 and 42, which depend from Claim 40.

In regard to Claim 31, the present invention is directed to an editing device. The Office Action finds that such device is rendered obvious by the combination of the teachings of Lang and Sasaki.

The Lang reference is directed to a device capable of transferring original data from a first removable storage medium (23₁) to a second removable storage medium (23₂). Importantly, the reception unit (11) can only receive one storage medium (23₁) at a time. During a transfer of data, original data is taken from storage medium (23₁), compressed, and stored in memory (13). Subsequently, the compressed data of memory (13) is expanded and transferred to storage medium (23₂), which then occupies the space vacated by storage medium (23₁).

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Applicants respectfully submit that the Lang reference fails to disclose an original, removable storage medium (e.g., storage medium (23₁)) that stores processed image data that requires restoration. Consequently, the structure of the Lang system that receives stored image data is fundamentally different from that claimed by the Applicants. Specifically, Lang fails to disclose, teach, or suggest:

a signal processor to restore processed image information, stored on a removable memory card received by the first reception unit, to original image information obtained in a photographing operation; and

. . .

While it is acknowledged that Lang teaches of a signal processor to decompress image data stored in memory (13), such is necessary due to the operation of the Lang device, which *receives uncompressed image data* and *outputs uncompressed image data* but, in an intermediate storage step, elects to compress the received image data for intermediate storage.

Appropriate to this attempted redesign of the Lang device, the MPEP states:

[if] the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. (citations omitted)

MPEP 2143.01 (7th ed. 1998 & Rev. 2000).

The additional reference of Sasaki does not aid in overcoming these fundamental deficiencies of Lang. In

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particular, the Examiner relies on Sasaki for the generalized teachings of removable memory cards. However, as provided above, even if the fixed memory (13) of Lang were interchangeable with a conventional memory card (for example, memory card (15) of Sasaki), neither Lang nor Sasaki provide for at least a signal processor in accordance with the claimed invention.

Consequently, Lang, alone or in combination with Sasaki, does not disclose, teach or suggest the claimed invention. Further, Applicants respectfully submit one having ordinary skill in the art could not reasonably combine these references, whether as cited or with any other known reference, to derive the present invention nor render it obvious. The above discussion is applied to Claim 37, which depends from Claim 31.

In reference to Claim 32, the Examiner further cited Watanabe as providing teachings of data decompression based on a particular manner, i.e., DCT. Incorporating the above discussion of the shortcomings of the Lang and Sasaki combination here, it is further submitted that the addition of Watanabe, even if given its broadest interpretation, does not enable a finding that the claimed inventions of Claim 32 (or Claim 31) is rendered obvious by these references given the fundamental differences between the claimed inventions and the cited references' combined teachings.

New Claims 47-51 are added by this Amendment to more fully claim different (but similar) aspects of the Applicants' inventions. For at least the reasons set forth above, the currently cited references equally

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fail to anticipate or render obvious these newly added claims.

Applicants respectfully submit Claims 20-22, 31-34, 37, and 40-57 are patentably distinct over the cited references and this Application is considered to be in condition for allowance. Applicants respectfully request Examiner's reconsideration of this matter in light of this Amendment and withdrawal of all rejections.

This Amendment increases the number of independent claims from four (4) to six (6) and increases the total number of claims from 15 to 20. This Amendment does not present any multiple dependency claims. Accordingly, for the excessive number of independent claims, please charge \$160.00 to Sidley & Austin Deposit Account 18-1260. If this amount is insufficient or another fee is due, please charge such fee (other than an issue fee) required during the pendency of this U.S. patent application to Sidley & Austin Deposit Account 18-1260.

If an extension of time is required to enable this document to be timely filed and there is no separate Petition for Extension of Time filed herewith, this document is to be construed as also constituting a Petition for Extension of Time under 37 C.F.R. § 1.136(a) for a period of time sufficient to enable this document to be timely filed. Any fee required for such Petition for Extension of Time and any other fee required by this document pursuant to 37 C.F.R. §§ 1.16 and 1.17, other than the issue fee, and not submitted

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herewith should be charged to deposit account No. 18-1260. Any refund should be credited to the same account.

Respectfully submitted,



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APPENDIX

VERSION WITH MARKINGS TO SHOW CHANGES MADE

The following is a marked-up version of the changes to the specification and claims 20, 40, and 43 that are being made in this Amendment.

IN THE SPECIFICATION

The paragraph beginning at page 48, line 25, and ending at page 49, line 7:

Referring to the flowcharts of FIGS. 14AS through 14D, the following paragraph describes the sequence executed when an interrupt occurs after step #104 in which interrupt was enabled. An interrupt occurs when any of the following switches is turned on, SC [SR] which detects existence/nonexistence of the IC card 2, SP which detects a transfer to the print mode, SV which requests reproduction of image on a TV screen, and access buttons ST and SW.

IN THE CLAIMS

20. (Six Times Amended) A camera comprising:
a camera body;
an imaging device to conduct a photographing operation, wherein following a photographing operation said imaging device outputs image information;
a first connection adapted to be connected to a first semiconductor memory;
a second connection adapted to be connected to a second semiconductor memory;
a recorder which stores image information, output from said imaging device, on one of the first

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semiconductor memory and the second semiconductor memory;

a detector to detect a memory condition [of at least one of the first semiconductor memory or the second semiconductor memory]; and

a changer, coupled to said detector, to selectively change between a first condition, in which image information outputted from said imaging device would be directed to the first connection for storage on a connected [is stored on said] first semiconductor memory, and a second condition, in which image information outputted from said imaging device would be directed to the second connection for storage on a connected [is stored on said] second semiconductor memory based on a detected condition by said detector.

40. (Five Times Amended) A camera comprising:
a camera body;

an imaging device to conduct a photographing operation, wherein following a photographing operation said imaging device outputs image information;

a first connection adapted to be connected to a first memory;

a second connection adapted to be connected to a second memory;

a recording device to store image information on one of the first memory and the second memory;

a detector to detect an available memory capacity [of at least one of the first semiconductor memory or the second semiconductor memory] and to output a signal representative of a result of such a detection; and

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a first changer to selectively change between a first condition, in which image information outputted from said imaging device would be directed to the first connection for storage in a connected [is stored on the] first memory, and a second condition, in which image information outputted from said imaging device would be directed to the first connection for storage in a connected [is stored on the] second memory, based on an output signal from the detector;

a reproduction device to receive and reproduce image information stored on and outputted from one of a connected [the] first memory and a connected [the] second memory; and

a second changer to select a memory from a connected first memory and a connected second memory to provide image information [selectively change between a third condition, in which image information stored on said first memory is output from said first memory to the reproduction device for reproduction, and a fourth condition, in which image information stored on said second memory is output from said second memory] to the reproduction device for reproduction.

43. (Four Times Amended) A camera comprising:

a camera body;

an imaging device to conduct a photographing operation, wherein following a photographing operation said imaging device outputs image information;

a first SRAM memory capable of storing image information corresponding to at least two photographic frames;

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a second SRAM memory, wherein at least one of said first SRAM memory and the second SRAM memory being provided in the camera body;

a recording device provided within the camera body for selectively storing image information on one of the first SRAM memory and the second SRAM memory;

a detector to detect a condition of one of the first SRAM [semiconductor] memory or the second SRAM [semiconductor] memory; and

a changer, coupled to said detector and provided within the camera body, for causing said recording device to selectively change from a first condition, in which image information outputted from said imaging device is stored on the first SRAM memory, and a second condition, in which image information outputted from said imaging device is stored on the second SRAM memory based on a detected condition of one of the first SRAM memory and the second SRAM memory.